

July 24, 2020

The Honorable Nina Gershon  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Paguirigan v. Prompt Nursing Employment Agency LLC, et al.*, 1:17 Civ. 1302 (NG) (JO)

**Joint Status Report from Counsel for All Parties**

Dear Judge Gershon:

The attorneys for all parties submit this letter to provide the Court with a status report on their efforts to reach agreement on the issue of damages.

At the last conference, the Court directed the parties to attempt to reach agreement as to the assumptions underlying each party's damages submission and the mathematical calculation that would flow from them and to provide the Court with a status report.

As we reported on June 8, 2020, the parties reached agreement on major components of the damages calculations including the identities of 133 class members who have potential damages claims, the dates each one started working for defendants, the locations where each one was first assigned, and the annual prevailing wage rate in effect for a Registered Nurse in the geographic area when each one started working.

Since then, the parties have exchanged lengthy spreadsheets with more than 14,000 lines of data detailing the regular compensation actually paid to each damages class member during each pay period.

We respectfully request until July 31, 2020 to advise the Court whether the parties can agree on the amount of damages, will request mediation with the Magistrate Judge or a mediator to resolve their differences, or will ask the Court to decide the amount of damages based on stipulated facts.

Respectfully submitted,

/s/ Joseph Zelmanovitz (JZ-0085)  
/s/ Elliot Hahn (EH-6087)  
Attorneys for Defendants

/s/ John J.P. Howley (JH-9764)  
Attorney for Plaintiff